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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

26 CHURCH OF SCIENTOLOGY OF CALIFORNIA,)

27 Plaintiff,)

28 vs.)

29 GERALD ARMSTRONG, DOES 1 THROUGH)
30 10, INCLUSIVE,)

31 Defendants.)

32 GERALD ARMSTRONG,)

33 Cross-Complainant,)

34 vs.)

35 CHURCH OF SCIENTOLOGY OF)
36 CALIFORNIA, a California)
37 corporation; L. RON HUBBARD;)
38 and DOES 1 THROUGH 100,)
INCLUSIVE,)

Cross-Defendants.)

PLAINTIFFS OBJECTION
TO PROPOSED ORDER
SUBMITTED BY
BENT CORYDON

Date:
Time:
Dept. 56

1 Plaintiff Church of Scientology of California objects
2 to the sentence appearing on lines 21-23 of page 2 of the
3 proposed order submitted by Bent Corydon, which states:

4 "The prohibition against disclosure and
5 dissemination shall continue until the Second
6 District Court of Appeal determines Civil Appeal
7 No. B 038975."

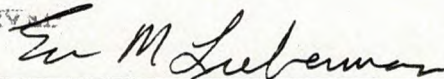
8 At the hearing in this case on April 16, 1991, the
9 court clearly stated that, in the event that this court's
10 order in this case is neither further stayed nor reversed by
11 the Court of Appeal, production of the tapes to Ms. Plevin
12 should be subject to a protective order. While this court
13 agreed that the terms of the protective order should be
14 similar to the terms of the protective order in place in the
15 pending appeal No. B 038975, this court did not suggest that
16 the imposition of the protective order was in any way
17 dependent on the outcome of that appeal, which involves
18 different issues and different kinds of documents (i.e.,
19 non-privileged pleadings and transcripts in this case).^{1/}
20 We note that it is highly significant that, in the Zolin
21 case, the IRS' access to the MCCA tapes is subject to a
22 strict protective order against disclosure even to other
23 agencies of the United States government, let alone other
24 parties. See United States v. Zolin, 809 F.2d 1411 (9th
25 Cir. 1987), aff'd, 109 S.Ct. 2619 (1989).

25 ^{1/} The MCCA tapes are not part of the record of the
26 underlying Armstrong case. They are held by the court
27 solely as a repository of documents taken by Armstrong.
28 They were excluded from evidence.

1 The language suggested by Corydon and objected to
2 above would condition the protective order upon the outcome
3 of the entirely separate pending appeal. The outcome of
4 that appeal has nothing to do with whether or not Corydon's
5 access to the MCCS tapes should be subject to a protective
6 order. Clearly it should not. Corydon's legitimate
7 interest, if any, in access to the tapes is fully redeemed
8 within the limitations of the protective order. He has no
9 legitimate interest in distributing the tapes outside the
10 confines of his litigation. If the Internal Revenue Service
11 must abide by a strict protective order in the Zolin case,
12 certainly Corydon must in this case.^{2/}

13 Dated: April 18, 1991
14 New York, New York

Respectfully submitted,



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24
25 ^{2/} Indeed, if Corydon were not subject to a protective
26 order, he could undermine the protective order imposed by
27 the Ninth Circuit and the Supreme Court in Zolin by
28 delivering copies of the tapes to anyone, including other
agencies of the United States government.

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Blvd., Suite 2000, Hollywood, California 90028.

On April 19, 1991, I caused to be served the foregoing document described as PLAINTIFFS' OBJECTION TO PROPOSED ORDER SUBMITTED BY BENT CORYDON on interested parties in this action as below:

Gerald Armstrong
P.O. Box 751
San Anselmo, CA 94960

Toby L. Plevin **HAND SERVED**
Attorney at Law
10700 Santa Monica Blvd.
Suite 4300
Westwood, CA 90025

If hand service is indicated, I caused the above referenced paper to be served by hand, otherwise I caused such envelopes with postage thereon fully prepaid to be placed in the United States mail at Hollywood, California.

Executed on April 19, 1991, at Hollywood, California.

Helen K. Loren